



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

August 30, 2007

Mike Gravel, Treasurer
Mike Gravel for President 2008
1600 North Oak Street, Number 1412
Arlington, VA 22209

Response Due Date:
September 28, 2007

Identification Number: C00423202

Reference: July Quarterly Report (4/1/07 - 6/30/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 items:

1. It appears that your committee is incorrectly disclosing loan payments made to the candidate. The loan payments that your committee discloses as a negative entry on Line 19(a) of Schedule A-P and as a positive entry on Line 27(a) of Schedule B-P do not equal the activity itemized on Schedule C-P.

When your committee makes a payment on a candidate loan, this payment should be reported as a positive entry on Line 27(a) of Schedule B-P. On Schedule C-P, the payment should be shown in the "Cumulative Payment to Date" field of the loan on which a payment is made. The loan's "Balance Outstanding" should also reflect this payment.

Please amend your report to clarify this activity and correctly disclose loan payments made to the candidate. (11 CFR § 104.3(b)(4)(iii))

2. It appears that your committee has incorrectly disclosed debt payments. The payments listed on Schedule B-P do not match those disclosed on Schedule D-P.

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Each expenditure to a person, which in the aggregate exceeds \$200 for the election cycle, must be reported on Schedule B-P. "Person" includes an individual, partnership, corporation, association, and public or private organization—other than an agency of the United States Government. These payments must also be reported on Schedule D-P in the "Payment This Period" field of the debt on which a payment is made. The debt's "Outstanding Balance at Close of This Period" should also reflect this payment.

Please amend your report to correct the discrepancies in the payments made to Michael Grant and Augustine Gyamfi. (11 CFR §§ 100.10 and 104.3(b)(4)(i))

3. Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in an election cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a request via mail, e-mail or telephone documented in writing. (11 CFR § 104.7(b)(2)) Follow-up requests should be done, if necessary. These requests must be documented clearly in the form of written records. The requests must:

- clearly ask for the missing information, without soliciting a contribution;

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- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A-P listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information and a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide for Congressional Committees and Candidates.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1169.

Sincerely,



Lauren Lien
Campaign Finance Analyst
Reports Analysis Division

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